

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

HOPE BOLDEN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 2:08cv00021-MEF
)	
MICKI BETH STILLER, and)	
MICKI BETH STILLER, P.C.,)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR EXTENSION
OF DEADLINE FOR FILING ANSWER**

Defendants Micki Beth Stiller and Micki Beth Stiller, P.C. move the Court for an Order extending the time within which said defendants must answer the Complaint heretofore filed in this matter, and as grounds therefore, represent to the Court as follows:

1. The Complaint contains five counts and 35 paragraphs, most of which are lengthy and contain numerous factual allegations.
2. Plaintiff has alleged violations of the FLSA requiring review of documents going back at least 3 years.
3. Defendant Micki Beth Stiller has been on a cruise and has been unable to confer in depth with counsel since the Complaint was served. Further, a principal witness for defendants, Attorney Donna Graves Richburg, has been ill and unable to meet with counsel. She is having a difficult pregnancy and currently has influenza. Ms. Richburg is an employee of Micki Beth Stiller, P.C. and has information that will be important in answering the Complaint.

4. Counsel for Plaintiff authorized defense counsel to represent to the Court that plaintiff does not object to an extension of twenty days of the time for filing an answer.

WHEREFORE, defendants move the Court for an Order granting a twenty-day extension of the time allowed by Rule 12 of the *Federal Rules of Civil Procedure* for filing an answer to the Complaint.

Respectfully submitted this 6th day of February, 2008.

/s/ M. Wayne Sabel
M. Wayne Sabel (SAB002)
Attorney for Defendants

OF COUNSEL:

SABEL & SABEL, P.C.
2800 Zelda Road, Suite 100-5
Montgomery, Alabama 36106
334-271-2770
334-277-2882 Fax

CERTIFICATE OF SERVICE

I do hereby certify that on the 6th day of February, 2008, I electronically filed the foregoing **DEFENDANTS' MOTION FOR EXTENSION OF DEADLINE FOR FILING ANSWER and PROPOSED ORDER** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Thomas G. Mancuso, Esq.
Constance C. Walker, Esq.
Attorneys for Plaintiff Hope Bolden
HASKELL SLAUGHTER YOUNG & GALLION, LLC
Post Office Box 4660
Montgomery, Alabama 36103-4660

/s/ M. Wayne Sabel
OF COUNSEL

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**ORDER GRANTING DEFENDANTS' MOTION FOR
EXTENSION OF DEADLINE FOR FILING ANSWER**

Defendants Micki Beth Stiller and Micki Beth Stiller, P.C. have requested a twenty-day extension of time for filing an answer, and having shown good cause; it is therefore

ORDERED, that said motion is granted and the deadline for filing an answer to the complaint is hereby extended for a period of twenty days.

DONE this _____ day of _____, 2008.

Magistrate Charles Coody